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12 * *Admitted pursuant to Ariz. Sup. Ct. R. 38(a)*

13 Additional counsel on next page.

14
15 IN THE UNITED STATES DISTRICT COURT
16 FOR THE DISTRICT OF ARIZONA
17

18 JANE DOE # 1; JANE DOE # 2; NORLAN
FLORES, on behalf of themselves and all
19 others similarly situated,

20 Plaintiff,

21 v.

22 Jeh Johnson, Secretary, United States
Department of Homeland Security, in his
23 official capacity; R. Gil Kerlikowske,
Commissioner, United States Customs &
Border Protection, in his official capacity;
24 Michael J. Fisher, Chief of the United States
Border Patrol, in his official capacity; Jeffrey
25 Self, Commander, Arizona Joint Field
Command, in his official capacity; Manuel
26 Padilla, Jr., Chief Patrol Agent-Tucson Sector,
in his official capacity,

27 Defendant.
28

Case No. 4:15-cv-00250-DCB

**DECLARATION OF
ELIZABETH BALASSONE IN
SUPPORT OF PLAINTIFFS'
MOTION TO PROCEED
UNDER PSEUDONYMS AND
FOR A PROTECTIVE ORDER**

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* Admitted pursuant to Ariz. Sup. Ct. R. 38(a)
** Pro hac vice motion pending
*** Admitted pursuant to Ariz. Sup. Ct. R. 38(f)

1 I, ELIZABETH BALASSONE, hereby declare:

2 1. I am a member of the bar of the State of California, an associate in the law
3 firm of Morrison & Foerster LLP and counsel of record for Plaintiffs in this litigation. I
4 have personal knowledge of the facts stated herein and, if called as a witness, could and
5 would competently testify thereto.

6 2. On June 16, 2015, I sent an email to Sarah Fabian, Senior Litigation
7 Counsel for the Office of Immigration Litigation, District Court Section, Department of
8 Justice and counsel of record for Defendants in this action. This email requested that the
9 parties meet and confer regarding Plaintiffs' Motion to Proceed under Pseudonyms and
10 For a Protective Order ("Motion").

11 3. On June 17, 2015, I sent another email to Ms. Fabian confirming a date and
12 time for the meet and confer, and explaining that Plaintiffs' Motion would request that the
13 identifies of Plaintiffs Jane Doe # 1 and Jane Doe # 2 be protected from public disclosure,
14 but that their identities would not be kept from Defendants.

15 4. On June 17, 2015, Ms. Fabian responded that Defendants would not oppose
16 the pseudonym motion, as long as they were provided the names and A#s of Plaintiffs
17 Jane Doe # 1 and Jane Doe # 2.

18 5. The parties met and conferred on June 22, 2015, and confirmed that
19 Defendants would not oppose the Motion.

20 6. Attached hereto as **EXHIBIT A** is a true and correct copy of the
21 Declaration of Jane Doe #1.

22 7. Attached hereto as **EXHIBIT B** is a true and correct copy of the
23 Declaration of Jane Doe #2.

24 8. Attached hereto as **EXHIBIT C** is a true and correct copy of an internet
25 printout entitled: *Advisory Opinion on the Rules of Confidentiality Regarding Asylum*
26 *Information*, U.N. High Comm'r for Refugees (March 31, 2005), *available at*
27 <http://www.refworld.org/pdfid/42b9190e4.pdf> (last visited June 19, 2015).

9. Attached hereto as **EXHIBIT D** is a true and correct copy of an internet printout entitled: *Fact Sheet: Federal Regulations Protecting the Confidentiality of Asylum Applicants*, U.S. Customs & Immigration Servs., Asylum Div., U.S. Dep't of Homeland Sec. (2005), *available at* http://www.uscis.gov/sites/default/files/USCIS/Laws/Memoranda/Static_Files_Memoranda/Archives%201998-2008/2005/fctsheetsconf061505.pdf (last visited June 19, 2015).

10. Attached hereto as **EXHIBIT E** is a true and correct copy of an internet printout entitled: *Memorandum: Confidentiality of Asylum Applications & Overseas Verification of Documents*, Bo Cooper, Gen. Counsel, Immigration & Naturalization Servs. (June 21, 2001) (Excerpt), *available at* <http://web.archive.org/web/20061130221925/http://judiciary.house.gov/Legacy/82238.pdf> (last visited June 19, 2015).

11. Attached hereto as **EXHIBIT F** is a true and correct copy of an internet printout entitled: *Asylum Officer Basic Training Course Participant Workbook*, U.S. Citizen & Immigration Servs. (Sept. 14, 2006), *available at* <http://www.uscis.gov/sites/default/files/USCIS/Humanitarian/Refugees%20%26%20Asylum/Asylum/AOBTC%20Lesson%20Plans/Interview%20Part-Overview-Nonadversarial-Asylum-Interview-31aug10.pdf> (last visited June 19, 2015).

12. Attached hereto as **EXHIBIT G** is a true and correct copy of an internet printout entitled: *Immigration Court Practice Manual*, Executive Office of Immigration Review at 62 (2015) (Excerpt), *available at* http://www.justice.gov/eoir/pages/attachments/2015/02/02/practice_manual_review.pdf (last visited June 19, 2015).

13. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 23rd day of June, 2015.

By: /s/ Elizabeth Balassone
Elizabeth Balassone